

## REMARKS

Claims 1 through 7 and 10 through 29 are pending in this application. Claims 8 and 9 were previously canceled.

The Office Action asserts that under 35 U.S.C. §103(a), claims 1, 10, 15, and 20 through 29 are unpatentable over U.S. Patent No. 5,911,776 to Guck in view of U.S. Patent No. 6,629,130 to Mertama.

Claim 1 provides a method for composing a computer message. The method includes presenting a message composition area for entry of an **unformatted** message into at least one text field and for entry of data into at least one selection field associated with the text field, and a message format selector for selecting an output format from a plurality of formats. The method also includes, in response to entry of an **unformatted** message into the message composition area and selection of one of the output formats, **converting the unformatted message to form a formatted message** from the text field with **format tags**. The formatted message is formatted according to the one of the output formats. Format tags are assigned to the formatted message and the formatted message is structured for display based on a selection field data from the at least one associated selection field.

Guck discloses a network providing a server using an object-database that enables an author to create and store an original document, as a source file with a first format. Software in the database provides multiple sets of shadow file-converter groups connected to the source file of the original document. Each shadow file-converter set enables the transformation of the original source file format into a another specific type of format.

Mertama discloses a method for implementing electronic mail services. The method parses the structure of electronic mail messages and expresses it to a client as necessary. A terminal sends a server an inquiry about the structure of a selected electronic mail message. The electronic mail message is identified by means of a tag,

which unambiguously identifies the message in the mailbox. The terminal analyses the format of the electronic mail message and checks the need for conversion. If conversion is necessary, the server carries out the selected conversion and gives the converted electronic mail message a new identifying tag and stores the message in a mailbox.

Guck and Mertama, either alone or in combination, do not render claim 1 obvious. Guck fails to disclose or suggest the step of presenting a message composition area for entry of an **unformatted message** into a text field. The Office Action asserts that Guck discloses creating a message in Rich Text Format (RTF), and that RTF is "unformatted" and "is not a tagging language like TIFF, SGML or HTML." These assertion are flatly contradicted by the disclosure of Guck, which states that RTF is a "a Microsoft standard for encoding formatted text and graphics." Col. 7, lines 1 and 2. The Office Action indicates that Guck "teaches converting Rich Text format (an untagged format) into TIFF (a tagged format)." As established above, an RTF message is not an unformatted message; Guck therefore fails to disclose or suggest converting an **unformatted message** to form a formatted message from a text field with format tags. Additionally, the Office Action argues that Guck "teaches an author can create its own message or document in his own format." Allowing a user to create his or her own message is not equivalent to "presenting a message composition area for entry of an unformatted message." Consequently, Guck does not render claim 1 obvious.

Mertama fails to remedy the deficiencies of Guck. The Office Action indicates that Mertama teaches assigning tags to formatted messages. Mertama does not disclose or suggest a composition area for entering an unformatted message, nor does it disclose or suggest converting an unformatted message to form a formatted message. In addition, the tags disclosed in Mertama are identifying tags, not formatting tags. See col. 5, lines 40-43 and 60-61. Therefore, Guck and Mertama, either individually or in combination, fail to render claim 1 obvious.

Claims 10, 15, and 20 through 29 include elements similar to those recited in claim 1. For at least the reasons given above in regard to claim 1, claims 10, 15 and 20 through 29 are patentable over Guck in view of Mertama.

The Office Action asserts that under 35 U.S.C. §103(a), claims 2 through 7, 11 through 14 and 16 through 19 are rendered obvious by Guck in view of Mertama as applied to claims 1, 10, 15, and 20 through 29, and further in view of U.S. Patent No. 6,230,173 to Ferrel.

Claims 2 through 7 depend from independent claim 1, claims 11 through 14 depend from independent claim 10, and claims 16 through 19 depend from independent claim 15.

Ferrel fails to overcome the deficiencies of Guck and Mertama as applied to claims 1, 10, 15, and 20 through 29. Ferrel discloses a story editor that is able to save files in a Multimedia Document Format (MDF). These multi-media files are then used to provide content for displayed online titles. Ferrel also discloses a method of translating Rich Text Format (RTF) files into MDF files. However, as outlined above, RTF is a standard for encoding **formatted** text and graphics. In other words, Ferrel discloses a method for translating files from one format to another. Ferrel does not disclose or suggest converting an **unformatted message** to form a formatted message. Therefore, claims 1, 10, and 15, and by virtue of their dependency, claims 2 through 7, 11 through 14, and 16 through 19 are all patentable over the cited Guck, Mertama, and Ferrel, either individually or in combination.

In view of the above, Applicant respectfully submits that all claims presented in this application are patentably distinguishable over the cited references and combination of references. Applicant respectfully requests favorable consideration and that this application be passed to allowance.

Respectfully submitted,

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